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May 19, 2004

Charles M. Auer
Director OPPT
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Re: HPV Commitment

Dear Mr. Auer,

Thank you for your letter of April 12th. I am writing to inform you of the status of our robust summaries and test plan. I apologize for the delay in submitting these items, but want to assure you that King Industries, Inc. is fully committed to fulfilling our requirements under the HPV Challenge Program.

During our draft of the robust summaries for existing studies, we needed to confirm the reliability of the data. Since many of these tests were performed over 20 years ago, we asked the laboratory to research their archives to help in this matter. Unfortunately this took more time than originally planned.

We should have the robust summaries and test plan ready to submit shortly. We will complete the testing in time and submit all of the data required on time.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Leonard J. Calbo, Ph.D.
Vice President, Coatings Product Group

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